

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LANDSCAPE CONSULTANTS OF
TEXAS, INC., and
METROPOLITAN LANDSCAPE
MANAGEMENT, INC.,

Plaintiffs,

v.

CITY OF HOUSTON, TEXAS, and
MIDTOWN MANAGEMENT
DISTRICT,

Defendants.

Civil Action No. 4:23-cv-03516

**PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

Plaintiffs Landscape Consultants of Texas, Inc. (Landscape Consultants) and Metropolitan Landscape Management, Inc. (Metropolitan), by counsel and pursuant to Rule 56 of the Federal Rules of Civil Procedure, for the reasons stated in the accompanying brief, move for summary judgment on the grounds that no dispute of material fact exists and Plaintiffs are entitled to judgment as a matter of law on their Equal Protection and 42 U.S.C. § 1981 claims.

Dated: November 29, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2024, I served this document via the Court's electronic filing system to Defendants' counsel of record as follows:

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